

March 29, 2016

VIA ECF

Honorable J. Paul Oetken  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Opera Solutions, LLC v. Steve Gold – 1:16-cv-02239-JPO  
Motion to Remove the Complaint from the Record and File Substitute  
Complaint

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Dear Judge Oetken:

Plaintiff Opera Solutions, LLC ("Opera") submits this letter motion to remove the Complaint from the record and file a substitute Complaint.

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On Friday, March 25, 2016, Opera filed the original version of the Complaint against Defendant Steve Gold. Opera has not yet served the Complaint, but on Monday, March 28, 2016, Opera provided Gold's counsel with a courtesy copy of the Complaint. In response, Gold has objected to the inclusion of certain information in the Complaint which he deems highly sensitive and confidential.

Opera has determined that the disputed information is not essential to its Complaint. Rather than dispute the confidential nature of the information with Gold, Opera is prepared to file a substitute Complaint that does not contain the disputed information. For these reasons, Opera requests that the Complaint be withdrawn from the record and Opera be granted leave to file a substitute Complaint. In the alternative, if this court prefers, Opera will file a motion to seal the present Complaint.

Sincerely,



Eric W. Wiechmann

BOSTON

HARTFORD

STAMFORD

NEW YORK

NEWARK

EAST BRUNSWICK

PHILADELPHIA

WILMINGTON

WASHINGTON, DC